

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION, a
Delaware corporation,

Defendants.

C.A. No. 04-1371-JJF

**DECLARATION OF JOHN M. SEAMAN IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO LG ELECTRONICS U.S.A. INC.'S COMBINED
OBJECTIONS AND MOTION TO QUASH AND MOTION FOR A
PROTECTIVE ORDER**

I, John M. Seaman, declare as follows:

1. I am an attorney with Bouchard, Margules & Friedlander, P.A., counsel of record in this action for Plaintiff Power Integrations, Inc. ("Power Integrations"). I am a member of the Bar of the State of Delaware. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. On September 13, 2005 Power Integrations served a subpoena on LG Electronics U.S.A. Inc. ("LG").

3. After service of this subpoena, I engaged in extensive negotiations with counsel for LG relating to the discovery of information requested in this subpoena. Power Integrations twice agreed to extend the time during which LG could respond to this subpoena.

4. During these negotiations, Power Integrations also agreed to narrow the focus of its inquiry, but LG maintained its refusal to provide any information responsive to Power Integrations' subpoena.

5. On November 9, 2005, I spoke to Lionel M. Lavenue, counsel for LG. Mr. Lavenue stated that LG possesses schematics identifying by "LG part number" the parts and components used in the products LG distributes in the United States. Mr. Lavenue further admitted that a master list for translating LG part numbers to manufacturer specific part numbers was likely held by LG's parent company, LG Electronics Inc. ("LG-Korea"), but stated that LG had no obligation to request such a list and would make no effort to do so.

6. Attached hereto as Exhibit A is a true and correct copy of a page from the website of Fairchild Semiconductor, which contains a January 20, 2000 press release stating "LG Electronics uses Fairchild semiconductors in a variety of products, including monitors, cellular telephones, VCRs, and television sets." This page can be found online at http://www.fairchildsemi.com/news/2000/0001/lg_award.htm.

7. Attached hereto as Exhibit B is a true and correct copy of a page from the website of Fairchild Semiconductor, which contains an October 7, 2004 press release noting further work with LG, including "recent design wins" with LG Electronics for "manufacturing display components." This page can be found online at http://www.fairchildsemi.com/news/2004/0410/extends_market_share.htm. These exhibits appear to provide further confirmation that the accused Fairchild parts are, in fact, being used in one or more products of LG, making the discovery sought by Power Integrations directly relevant to the issues in this case.

Executed this 18th day of November, 2005, at Wilmington, Delaware.


John M. Seaman